

4. The incident described below occurred in the Borough of Anchorage and, as a result, venue properly lies with this Court.

5. Jurisdiction properly lies with this Honorable Court.

6. That on or about October 26, 2017 CARROLL was a guest at the VOYAGER INN, a lodging establishment owned by HICKEL INVESTMENT COMPANY and managed by The Hotel Captain Cook.

7. That on or about October 26, 2017 CARROLL was stepping into the shower of her guest room at VOYAGER INN, when suddenly and without warning, the shower floor mat slid out from under her causing her to crash to the shower floor, falling onto her right knee and left elbow, and breaking her right tibia.

8. That the hotel Security Director for The Hotel Captain Cook, Tyler Drinkenburg, tested the shower floor mat and acknowledged he found it defective.

9. That HICKEL INVESTMENT COMPANY did not ensure the safety of the guests of VOYAGER INN by taking steps to maintain its guest rooms including, but not limited to, making sure all shower floor mats were secure and slip-proof.

10. As a direct and proximate result of HICKEL INVESTMENT COMPANY'S negligent maintenance of VOYAGER'S guest rooms, including the bath and shower areas, CARROLL suffered severe and permanent physical

CROWSON
LAW GROUP

637 A STREET
ANCHORAGE, ALASKA
99501

907-677-9393

1981 E. PALMUR-WASILLA HWY.
SUITE #220
WASILLA, ALASKA
99654

Carroll v. Hickel Investment Company
Case No. 3AN-18- CI
Complaint
Page 2 of 5

injury.

11. As a direct and proximate result of HICKEL INVESTMENT COMPANY'S actions in failing to maintain VOYAGER'S guest rooms, including the bath and shower areas, such that the guests could take showers in a safe manner, CARROLL suffered mental injury and severe emotional distress.

12. As a direct and proximate result of HICKEL INVESTMENT COMPANY'S negligent actions, CARROLL incurred medical bills and expenses; and was caused to endure pain and suffering for which CARROLL will be required to expend and become liable for, and expenses relating to future medical care and services.

13. HICKEL INVESTMENT COMPANY had a duty to ensure that VOYAGER was managed and maintained in a way to ensure the safety of its guests.

14. That on the occasion in question HICKEL INVESTMENT COMPANY was negligent in the following particulars, among others, to-wit:

- a. Failure to hire competent employees;
- b. Failure to properly train its employees;
- c. Failure to maintain the safety of its guests;
- d. Negligent operation of its property;
- e. Reckless management of its employees; and
- f. Was otherwise careless and negligent in the operation of its premises.

Carroll v. Hickel Investment Company
Case No. 3AN-18- CI
Complaint
Page 3 of 5

CROWSON
LAW GROUP

637 A Street
ANCHORAGE, ALASKA
99501

907-677-9393

1981 E. PALMER-WASHITA HWY.
SUITE #220
WASILLA, ALASKA
99654

15. That the incident described herein was solely due to the above described actions of HICKEL INVESTMENT COMPANY without any comparative negligence or recklessness by CARROLL.
16. As a direct and proximate result of the incident described above, CARROLL, was caused to sustain severe and permanent injury; caused to incur medical bills and expenses; and was caused to endure pain and suffering. CARROLL further expended, and will expend and become liable for, large sums of money for medical care and services endeavoring to become healed and cured of said injuries. Furthermore, CARROLL, was precluded from enjoying her usual avocations.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff SHARON H. CARROLL prays judgment against the Defendant, HICKEL INVESTMENT COMPANY, as follows:

1. For general damages including, but not limited to, pain and suffering and mental anguish both in the past and in the future.
2. For all past and future medical and incidental expenses according to proof.
3. For all lost wages past and future according to proof.
4. For costs of suit herein incurred.
5. That this case be tried by jury.
6. For any and all other damages and relief to which CARROLL, is entitled under the laws of the State of Alaska.

CROWSON
LAW GROUP

637 A STREET
ANCHORAGE, ALASKA
99501

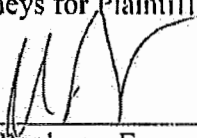
907-677-9393

1981 E. PALMER-WASILLA HWY.
SUITE #220
WASILLA, ALASKA
99654

Carroll v. Hickel Investment Company
Case No. 3AN-18- CI
Complaint
Page 4 of 5

Respectfully submitted on this the 11 day of December 2018.

CROWSON LAW GROUP
Attorneys for Plaintiff

By: 
Mark Rayburn, Esq.
ABA #1609067
Mark@Crowsonlaw.com

CROWSON
LAW GROUP

637 A STREET
ANCHORAGE, ALASKA
99501

907-677-9393

1981 B PALMER-WASHU HWY.
SUITE #220
WASHU, ALASKA
99654

Carroll v. Hickel Investment Company
Case No. 3AN-18- CI
Complaint
Page 5 of 5